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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 IN RE: TFT-LCD (FLAT PANEL)
16 ANTITRUST LITIGATION

No. 3:07-md-1827 SI
MDL No. 1827

17
18 This Document Relates to Individual
Case No. 11-cv-02495

Individual Case No.: 11-cv-02495

19
20 JACO ELECTRONICS, INC.,

**STIPULATION AND [PROPOSED]
ORDER REGARDING SERVICE
AND SCHEDULING**

21 Plaintiff,

22 v.

23 AU Optronics Corporation, et al.,

24 Defendants.

1 WHEREAS Plaintiff Jaco Electronics, Inc. (“Plaintiff”) filed a complaint (the
2 “Complaint”) in the above-captioned case against Defendants AU Optronics Corporation; AU
3 Optronics Corporation America; Chi Mei Corporation; Chimei Innolux Corporation (f/k/a Chi
4 Mei Optoelectronics Corporation); Chi Mei Optoelectronics USA, Inc.; CMO Japan Co., Ltd.;
5 Nexgen Mediatech, Inc.; Nexgen Mediatech USA, Inc.; Epson Imaging Devices Corporation;
6 Epson Electronics America, Inc.; HannStar Display Corporation; LG Display Co. Ltd.; LG
7 Display America, Inc.; Renesas Electronics America; Samsung SDI Co., Ltd.; Samsung SDI
8 America, Inc.; Sanyo Consumer Electronics Co., Ltd.; Sanyo North America Corporation; Sharp
9 Corporation; Sharp Electronics Corporation; Tatung Company of America, Inc.; Toshiba
10 Corporation; Toshiba America Electronic Components, Inc.; Toshiba Mobile Display
11 Technology Co., Ltd.; and Toshiba America Information Systems, Inc. (the “Original
12 Defendants”) on May 20, 2011;

13 WHEREAS Plaintiff filed a First Amended Complaint on July 12, 2011, naming
14 as additional defendants, among other parties, Philips Electronics North America Corporation
15 and Koninklijke Philips Electronics N.V. (the “Stipulating Defendants”);

16 WHEREAS on July 14, 2011, Plaintiff and the Original Defendants stipulated that
17 the Original Defendants’ deadline to move to dismiss, answer, or otherwise respond to the First
18 Amended Complaint would be October 12, 2011;

19 WHEREAS Plaintiff wishes to avoid the burden and expense of serving process
20 on the Stipulating Defendants;

21 WHEREAS the Stipulating Defendants desire a reasonable amount of time to
22 respond to the Complaint;

23 WHEREAS Plaintiff and the Stipulating Defendants believe that proceeding on a
24 unified response date will create efficiency for the Court and the parties by reducing duplicative
25 motion practice;

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1 THEREFORE, Plaintiff and the Stipulating Defendants hereby agree:

2 1. The Stipulating Defendants waive service of the First Amended Complaint
3 under Federal Rule of Civil Procedure 4(d). This stipulation does not constitute a waiver by the
4 Stipulating Defendants of any other substantive or procedural defense, including but not limited
5 to the defense of lack of personal or subject matter jurisdiction and improper venue.

6 2. The Stipulating Defendants' deadline to move to dismiss, answer, or
7 otherwise respond to the First Amended Complaint will be October 12, 2011.

8 IT IS SO STIPULATED.

9 DATED: August 25, 2011

10 /s/ Brendan P. Cullen

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19 *America Corporation and Koninklijke Philips Electronics*
N.V.

20 /s/ Jason C. Murray

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Attorneys for Plaintiff Jaco Electronics, Inc..

1 I, Brendan P. Cullen, am the ECF User whose ID and password are being used to file this
2 Stipulation and [Proposed] Order Regarding Service and Scheduling. In compliance with General Order
3 45, X.B., I hereby attest that Jason C. Murray concurred in this filing.

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5 Dated: August 25, 2011

/s/ Brendan P. Cullen

Brendan P. Cullen

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8 Having considered the foregoing stipulation, and good cause appearing,

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10 **IT IS SO ORDERED.**

11 8/30/11



Judge Susan Illston